# EXHIBIT 1

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

ePLUS iNC.,	)
Plaintiff,	) Civil Action No. 3:09cv620(REP)
<b>v.</b>	)
LAWSON SOFTWARE, INC.,	)
Defendant.	) ) )

# PLAINTIFF ePLUS INC.'S FOURTH SET OF INTERROGATORIES TO DEFENDANT LAWSON SOFTWARE, INC.

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff ePlus inc., ("ePlus"), hereby requests that, within thirty (30) days of the date of service of these interrogatories, and in accordance with the following definitions and instructions, Defendant Lawson Software, Inc. ("Lawson") answer separately, in writing, and under oath, by an officer or duly authorized agent of Lawson, the following interrogatories.

The following interrogatories are continuing, and Lawson must promptly supplement its answers in accordance with Federal Rule 26 as additional or corrected information comes to its attention and that of its attorneys.

#### **DEFINITIONS & INSTRUCTIONS**

The Definitions and Instructions sections of *e*Plus's First Set of Interrogatories to Lawson shall apply to all interrogatories below and are incorporated herein by reference.

#### **INTERROGATORIES**

#### **Interrogatory No. 24:**

Identify, on a customer-by-customer basis for each Lawson customer, from May 2003 until the present: (i) the modules of Lawson's S3 Supply Chain Management Suite and/or M3 Supply Chain Management Suite and/or other Lawson Electronic Sourcing and Procurement System(s) and/or Service(s) which Lawson has made, used, sold, offered for sale, imported, licensed, implemented, maintained, and/or serviced for/to each such customer, and/or which modules such customers used, purchased, licensed, implemented or had implemented. maintained or had maintained, or serviced or had serviced; (ii) for each such customer the dates and periods of time during which these activities occurred for each such module(s) and combination(s) of modules; and (iii) the revenues to Lawson attributable to each customer with respect to these activities and for each such module(s) and combination(s) of modules, including revenues relating to license fees, maintenance and support fees, implementation, training, and consulting. The modules pertinent to this interrogatory include, without limitation, the Lawson S3 Purchase Order, Requisitions, Inventory Control, Requisitions Self-Service, Procurement Punchout and EDI modules, and/or the M3 e-Procurement module. Your answer must include, without limitation, an identification of all Lawson customers that have purchased, licensed, used, and/or implemented any of the above-identified modules from May 2003 to the present, and the combinations/configurations/arrangements of such modules for each such customer during this period of time.

### **Interrogatory No. 25:**

Identify by bates number all documents relating to the information provided in Lawson's answer to Interrogatory No. 24, including without limitation all licenses, contracts, invoices, and Statements of Work, and any other documents consulted and/or relied upon by Lawson in providing its answer to Interrogatory No. 24, and specify on a customer-by-customer basis the bates numbers of such documents applicable to each customer.

November 18, 2009

Respectfully submitted,

Scott L. Robertson (Admitted pro hac vice)

Jennifer A. Albert (Admitted pro hac vice)

Jennifer A. Albert (Admitted pro hac vice)

David M. Young (VSB #35997) Robert D. Spendlove (VSB #75468)

#### **GOODWIN PROCTER LLP**

901 New York Avenue, N.W. Washington, DC 20001

Telephone: (202) 346-4000 Facsimile: (202) 346-4444

Lana S. Shiferman (Admitted *pro hac vice*) James D. Clements (Admitted *pro hac vice*)

#### GOODWIN PROCTER LLP

Exchange Place 53 State Street Boston, MA 02109-2881

Telephone: (617) 570-1000 Facsimile: (617) 523-1231

Craig T. Merritt (VSB #20281) Henry I. Willett, III (VSB #44655)

# CHRISTIAN & BARTON, LLP

909 East Main Street, Suite 1200 Richmond, Virginia 23219-3095

Telephone: (804) 697-4100 Facsimile: (804) 697-4112

Attorneys for Plaintiff *e*Plus inc.

#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 18th day of November, 2009, I will serve Plaintiff *e*Plus inc's FOURTH SET OF INTERROGATORIES TO DEFENDANT LAWSON SOFTWARE, INC., on the following counsel of record as indicated:

#### via electronic mail:

Stephen E. Noona (VSB #25367) Kaufman & Canoles, P.C. 150 West Main Street, Suite 2100 Norfolk, VA 23510 Telephone: (757) 624-3289 Facsmile: (757) 624-3169 senoona@kaufcan.com

#### Counsel for Defendant Lawson Software, Inc.

Daniel McDonald, pro hac vice
William D. Schultz, pro hac vice
Rachel C. Hughey, pro hac vice
Joshua P. Graham, pro hac vice
Andrew Lagatta, pro hac vice
MERCHANT & GOULD
3200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
Telephone: (612) 332-5300
Fax: (612) 332-9081
dmcdonald@merchantgould.com

Counsel for Defendant Lawson Software, Inc.

Robert A. Angle, VSB #37691
Dabney J. Carr, IV, VSB #28679
TROUTMAN SANDERS LLP
P.O. Box 1122
Richmond, Virginia 23218-1122
Telephone: (804) 697-1238
Fax: (804) 698-5119
Telephonet angle@troutmansanders.com

robert.angle@troutmansanders.com dabney.carr@troutmansanders.com

Counsel for Defendant Lawson Software, Inc.